

From: [MILLER Margaret * DEQ](#)
To: [Vaupel, Claudia](#); [Dubois, Christi](#); [HEROUX Tori * DEQ](#); [BARNACK Anthony * DEQ](#)
Cc: [WILLIAMS Karen * DEQ](#)
Subject: ODEQ - EE Prenotification Letter (2021)
Date: Tuesday, March 15, 2022 12:53:51 PM
Attachments: [20220314_ODEQ_EE_Notification_Letter_KFallsPM2.5_2021_signed.pdf](#)

Dear Ms. Vaupel and Ms. Dubois,

The Oregon Department of Environmental Quality (ODEQ) would like to formally notify the EPA that we plan to seek Exceptional Events Demonstration for the City of Klamath Falls for wildfire smoke impacts occurring in the summer of 2021. The wildfire smoke impacts will cause a violation of the National Ambient Air Quality Standards (NAAQS) for PM_{2.5}.

In our preliminary analyses, we identified 36 days that are of regulatory significance these are flagged as RT below.

Table 1.0 – Klamath Falls PM 2.5 values, sorted by date

Klamath Falls PM 2.5

Date	PM 2.5 ug/m3		Flag	Notes
	FEM	FRM		
7/11/2021	43.35	-	RT	Regulatory Significance on either the FEM monitor or the FRM monitor
7/13/2021	37.27	-	RT	
8/4/2021	65.09	-	RT	
8/5/2021	80.29	-	RT	
8/7/2021	43.54	-	RT	
8/9/2021	47.33	-	RT	
8/10/2021	49.71	-	RT	
8/11/2021	80.06	-	RT	
8/12/2021	111.20	-	RT	
8/13/2021	130.45	-	RT	
8/14/2021	133.40	132	RT	
8/15/2021	125.56	-	RT	
8/17/2021	81.76	-	RT	
8/19/2021	63.69	-	RT	
8/20/2021	73.08	-	RT	
8/21/2021	78.24	-	RT	
8/22/2021	63.32	-	RT	
8/23/2021	62.92	-	RT	
8/24/2021	69.86	-	RT	
8/25/2021	68.75	-	RT	
8/26/2021	57.06	61.9	RT	
8/27/2021	85.83	-	RT	
8/29/2021	41.53	-	RT	
8/30/2021	78.47	-	RT	
8/31/2021	58.03	-	RT	
9/1/2021	55.01	55.3	RT	
9/3/2021	38.82	-	RT	

9/4/2021	77.75	-	RT
9/5/2021	86.34	-	RT
9/6/2021	55.94	-	RT
9/7/2021	50.21	52.3	RT
9/8/2021	71.05	-	RT
9/9/2021	80.17	-	RT
9/10/2021	42.95	-	RT
9/15/2021	37.91	-	RT

RT = wildfire smoke impact with regulatory significance.

All data has been verified by ODEQ and is in the EPA Air Quality System (AQS) as final data. It has not been officially certified by DEQ yet, but we anticipate that will happen before May 1, 2022.

As part of our preliminary analysis, we have also included FEM values that were impacted by the summer wildfire smoke, but do not have regulatory significance because the FEM three year 98th percentile values is above the NAAQS. This is due to the T640x bias from 2019 to June of 2021. We have flagged them since they have potential for future impact on NAAQS compliance in the community.

If you have any questions or concerns please do not hesitate to contact Anthony Barnack (DEQ) at Anthony.barnack@deq.oregon.gov, Margaret Miller (DEQ) at margaret.miller@deq.or.gov or Tori Heroux (DEQ) at Tori.Heroux@deq.oregon.gov.

Sincerely,
Margaret Miller, Tori Heroux & Anthony Barnack

Margaret Miller

Air Quality Planner | Forester
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